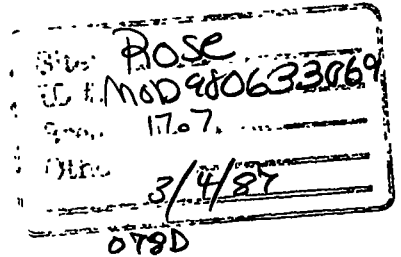


ENVIRONMENTAL PROTECTION AGENCY ACTIVITIES
STATUS OF MARTHA C. ROSE CHEMICALS, INC. SITE
IN HOLDEN, MISSOURI

March 4, 1987



1. Legal Activities

A CERCLA Section 106 Administrative Order on Consent has been entered into by 13 companies and utilities (Rose Chemical Steering Committee) that sent PCBs or PCB items to the Holden facility, Lear Siegler, Inc. and the city of Holden. Pursuant to this order, the work plans submitted by the committee have been reviewed and formal comments from EPA returned to the committee. Much of the work to secure and stabilize the site and contain PCB releases has been completed.

The majority of the responses to the CERCLA Notice Letters, which were initially sent to approximately 650 potentially responsible parties (PRP), have been received and reviewed by EPA staff. Telephone conferences are conducted in response to PRP questions and follow-up letters as appropriate are prepared. Other PRPs continue to be identified, and approximately 100 additional notice letters have been sent out.

2. Remedial Activities

The Clean Sites, Inc. (CSI) contractor for the Steering Committee is over 95 percent complete with the inventory of the vast amount of material at the site in preparation for final remedial actions. Completion of the inventory is expected around the end of March.

3. Immediate Removal Activities

Sample results indicate that the Hayes subsite has been cleaned to below the PCB level of concern. All known contaminated equipment and materials, with the exception of a boat located on the Buxton property, have been returned to the Holden site. The boat has been secured with a plastic cover. Remaining contamination at the Huhn subsite will be addressed when the out-of-town owners grant access and, in compliance with their request, can be present during cleanup of their property.

During a tour of the site, the EPA On-Scene Coordinator requested that oil film on the water in the processing area large pit be skimmed off and stored on site in a tank or drum. This has been done.



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SUPERFUND RECORDS

4. Ultimate Site Cleanup

The Steering Committee has hired a technical consultant to develop a data base of appropriate methods to remediate PCBs. The consultant is expected to issue a report focused on each of the PCB waste streams at the site by the end of March.

Representatives of the Rose Chemical Steering Committee and EPA met on March 3, 1987, to continue discussions on various ultimate disposal options.

The provisions of SARA may require alterations in the process of formalizing agreements to clean up the sites. While not a barrier to settlement, the new provisions are legally complex and are being evaluated by both EPA and the Steering Committee.

5. Accumulated PCB Sludge at Holden, Missouri

The sludge, the majority of which is now solidified with kiln dust, can be disposed of in an approved sanitary landfill. Approval of request for disposal at Southwest Landfill, Kansas City, Missouri, was denied by the landfill operators. A Missouri landfill operator has also agreed to accept the sludge if the necessary permit can be obtained from the state.

6. Site Security

A chain link fence with locked gates surrounds the site. Initial security steps consisted of security personnel patrolling the grounds around-the-clock, documented by a clock check each hour at the on-site security station. However, these measures failed to prevent a break-in and EPA advised representatives of the Steering Committee that more extensive security would be necessary. Additional security measures have been implemented and the feasibility of high technology surveillance systems is being evaluated.

7. Fire Prevention

A number of fire safety measures to reduce the chance of fire were initiated by the Steering Committee when they took control of the site. Discussions with EPA and the Holden Fire Department, in the wake of a fire in Holden, have resulted in the committee's agreement to fund substantial additions to on-site fire protection.